



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

November 25, 2013

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: CG Docket No. 13-46—Telecommunications Industry Association’s Pending
Petition for Rulemaking

Dear Commissioners:

The American Speech-Language-Hearing Association (ASHA) is pleased to have the opportunity to comment on CG Docket No. 13-46— the Telecommunications Industry Association’s (TIA’s) pending Petition for Rulemaking—which requests that the Commission expeditiously take an important step towards improving the access and experience for hard-of-hearing users of terminal equipment (“TE”), such as analog and digital wireline telephones, by undertaking a rulemaking to update references in Part 68 of the FCC’s rules to TIA standards that set hearing aid compatibility (“HAC”) volume control requirements.

ASHA is the national professional, scientific, and credentialing association for more than 166,000 members and affiliates who are audiologists, speech-language pathologists, speech, language, and hearing scientists, audiology and speech-language pathology support personnel, and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, as well as swallowing disorders.

We submit the following comments on CG Docket No. 13-46 on Access to Telecommunications Equipment and Services for people with disabilities to be considered by the Commission.

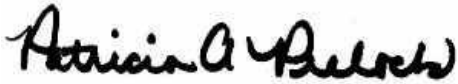
Comments

ASHA supports TIA’s request to the FCC to open the rulemaking that would update Part 68.317 Volume Control Requirements for analog and digital wireline telephones. Standardization of volume control for analog and digital landline phones is an important step in improving access and user experience of over 36 million Americans with hearing loss, many of whom use landline telephones. These proposed changes would allow consumers with hearing loss (and audiologists assisting them) to readily compare the sound levels of various digital and hardwire phones to determine which devices best meet their amplification needs. The variability and confusion in the telephone marketplace today is quite frustrating to consumers as well as the professionals who are assisting them.

Standards currently referenced in the regulations are outdated. The new TIA ANSI standard, TIA-470.110-D, which will be approved for publication in November 2013, includes important advances for the measurement of sound from these devices. These advances include 1) a change in the type of artificial coupler used from the IEC coupler for supra-aural earphones to the Head and Torso Simulator, which is more representative of the user experience and 2) the introduction of *Conversational Gain*, a more realistic metric for measuring speech through a phone. The use of *Conversational Gain* would provide an absolute reference (starting point) of 64dB SPL through a speakerphone and 70dB SPL through the handset so that any additional gain (volume) provided by the phone would be clear to the consumer. ASHA also encourages TIA and the FCC to work towards improving standards for wireless telephone technology as more and more consumers are utilizing this mode of communication.

Thank you for the opportunity to comment on Petition for Rulemaking. Should you have questions about our comments, please contact Catherine D. Clarke, ASHA's director of education and regulatory advocacy, at 202-624-5953 or by e-mail at cclarke@asha.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia A. Prelock". The signature is fluid and cursive, with the first name "Patricia" being more prominent.

Patricia A. Prelock, PhD, CCC-SLP
2013 ASHA President